

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MAHAMMOUD SAKHI, individually and)	
on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action
)	No. 4:15-cv-1668
BLUENRGY GROUP LIMITED,)	
f/k/a CBD ENERGY LIMITED, ET AL.,)	
)	
Defendants.)	

**REQUEST FOR ORAL ARGUMENT BY DEFENDANTS
NATIONAL SECURITIES CORPORATION AND
NORTHLAND SECURITIES, INC.**

Pursuant to Section 6(d) of Judge Miller’s Court Procedures entitled “Young Lawyers,” Defendants National Securities Corporation and Northland Securities, Inc. (“Underwriter Defendants”) respectfully request a hearing on their Motion to Dismiss (Dkt. No. 45).¹ Underwriter Defendants believe that oral argument will better enable the parties and the Court to address the facts, law, and issues presented in their Motion to Dismiss.

If the Court grants a hearing on the Motion to Dismiss, the argument would be handled by a young lawyer, Sal Subasinghe (junior associate), with the assistance of James P. Sullivan (senior associate).

¹ Lead Plaintiff filed his Omnibus Opposition to Defendants’ Motions to Dismiss (Dkt. No. 73) on March 21, 2016. Underwriter Defendants filed a Reply in support of their motion to dismiss (Dkt. No. 74) on March 30, 2016.

March 31, 2016

Respectfully submitted.

/s/ Paul R. Bessette
Paul R. Bessette
Texas Bar No. 02263050
S.D. Tex. Bar No. 22453

Michael J. Biles
Texas Bar No. 24008578
S.D. Tex. Bar No. 23146

James P. Sullivan
Texas Bar No. 24070702
S.D. Tex. Bar No. 1196607

Srimath S. Subasinghe
Texas Bar No. 24093226
S.D. Tex. Bar No. 2487169

KING & SPALDING LLP
401 Congress Avenue, Suite 3200
Austin, Texas 78701
pbessette@kslaw.com
[Tel.] (512) 457-2000
[Fax] (512) 457-2100

*Counsel for Defendants National
Securities Corporation and Northland
Securities, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on March 31, 2016, I electronically filed the foregoing request with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I mailed the foregoing request and the notice of electronic filing by first-class mail to all non-CM/ECF participants.

/s/ Paul R. Bessette
Counsel for Defendants
National Securities Corporation and Northland
Securities, Inc.